



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1500 N.E. IRVING STREET

P.O. BOX 3737

PORTLAND, OREGON 97208

November 23, 1977

Based on a review and evaluation of the information contained in the supporting reference cited below, I have determined that implementation of the Sheldon Horse Management Plan would not constitute a major Federal action significantly affecting the quality of the human environment within the meaning of Section 102(2)(C) of the National Environmental Policy Act of 1969. Accordingly, the preparation of an Environmental Impact Statement on the proposed action is not required.

Supporting Reference

Sheldon Horse Management Plan, Environmental Impact Assessment, November, 1977.

Regional Director



Save Energy and You Serve America!

REVISED

SHELDON HORSE MANAGEMENT PLAN

ENVIRONMENTAL IMPACT ASSESSMENT

1. DESCRIPTION OF THE PROPOSED ACTION

A. Introduction

The Sheldon National Antelope Refuge and Charles Sheldon Antelope Range lie in northwestern Nevada, in the northern portions of Washoe and Humboldt Counties. On February 27, 1976 PL 94-223 was signed transferring sole jurisdiction of the Range to the U.S. Fish and Wildlife Service. Previously the Range had been jointly administered with the Bureau of Land Management. Wildlife resources had been managed by the Service and the Bureau had administered the grazing program under provisions of the Taylor Grazing Act. Now management of all resources of the Range, including free-roaming horses, is a Service responsibility.

Following the recent jurisdictional transfer, the Service re-examined ongoing management practices and determined that a comprehensive, coordinated resource management plan for the Range and Refuge was needed. Additionally, due to prior commitments having been made by the Bureau to prepare an environmental impact statement (EIS) on its grazing program, the Service decided that it would be appropriate to combine that EIS with one on implementation of the resource management plan. The plan and EIS are scheduled to be prepared within the next two years.

However, because there are serious abuses currently occurring to the Range as a result of increasing and uncontrolled horse numbers and past livestock management practices, the Service determined that immediate action had to be taken to reduce grazing pressures. Therefore, this EIA discusses implementation of an emergency horse management plan. The horse management plan is only an initial step in a complete habitat improvement program which will be covered in detail in the resource management plan and EIS. Following completion, the Service anticipates a complete revamping of the current livestock grazing system.

B. Existing Situation

The exterior boundary of the 540,000-acre Range is fenced, except for about eight miles of the south side and the entire east side. Existing fences exclude most horse

movement onto the Range from adjacent lands. There is no known horse entry to the Range from the east side.

Limited interior fencing allows nearly unlimited movement of horses within the entire Sheldon area. As horse numbers increase unchecked, existing vegetative resources are being depleted. Small bands of horses are leaving larger herds and re-establishing in new areas. Competition for water is evident in high-use areas; fenced spring enclosures are continually damaged or destroyed by horses.

There are five horse populations on the Range. These are comprised of two large populations and three smaller, expanding populations. (See Figure 1)

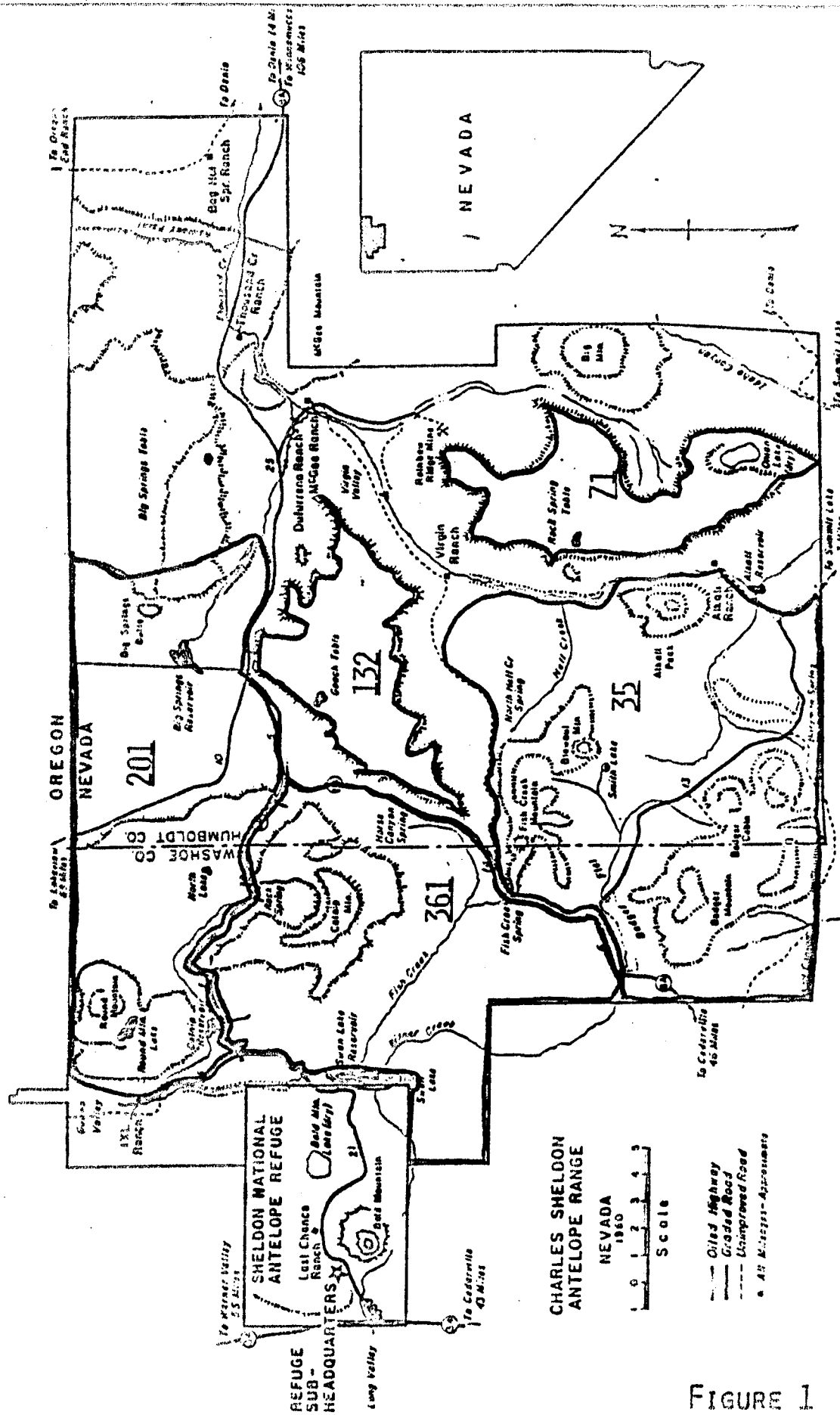
Two of the smaller populations are on Gooch and Rock Spring Tables. Both Tables were set aside for exclusive wildlife use during early livestock adjudications. They are key antelope and sage grouse areas, and use by horses reduces their ability to support populations of wildlife.

A third area into which horses are expanding is the Blowout Mountain-Badger Mountain area. This includes the area west of Virgin Creek and south of Hell Creek to the south and west boundaries. This area is a key mule deer area and recently has become an important range for bighorn sheep. Bighorns were reintroduced into the area in the late 1960s. Again, horses in this area compete with important wildlife species.

The two areas currently receiving the highest amount of horse use are Catnip Mountain-Bitner Creek and Round Mountain-Big Spring Butte. Catnip Mountain is a key spring-summer-fall deer range, and Sage Hen Hills, located between Round Mountain and Big Spring Reservoir, is crucial winter range for deer and sage grouse. Horse Heaven and Bitner Butte are key antelope spring-summer-fall use areas. Competition for forage and water with large numbers of horses reduces their value for these purposes.

Free-roaming horse numbers have been increasing at an annual rate of nearly 25 percent. In 1973, 398 horses were counted on the Range and by July 1976, their numbers had reached about 800. By 1980, their numbers are projected to double again. If this were allowed, irreparable damage to the forage, water and wildlife resources of the Range would occur.

Year-round horse use of important wildlife areas is the most serious problem. Range condition is generally low-fair to poor in these areas, and the trend is downward



--particularly around water sources. Springs and adjacent stringer meadows are being severely abused.

C. Management Objectives

To insure that the forage and water resources of the Charles Sheldon Antelope Range are protected and perpetuated for the purpose of maintaining attendant wildlife populations in a manner consistent with the purposes for which the Range was established, it is proposed that a plan for reducing the number of free-roaming horses be implemented.

The objectives of the horse management plan are:

1. To provide a forage base sufficient to maintain a manageable horse population in balance with native wildlife species for the enjoyment of refuge visitors. It has been determined that managing two separate horse populations for a total herd size of 75 to 125 head would be consistent with wildlife objectives. Figure 2 delineates the boundaries of the proposed horse management unit.
2. To stop range deterioration and improve wildlife habitat and watershed conditions; to reduce adverse impacts on existing water resources.
3. To insure that the Sheldon Range provides ample forage for all wildlife populations endemic to the area; to reduce the spread of horses into key wildlife areas.

Table 1 (below) shows existing and objective herd sizes on the Range:

Table 1
Free-Roaming Horse Numbers
Existing and Objective

Area Name	Existing Numbers 1976 Inventory	Proposed Objective
Blowout Mtn.-Badger Mtn.	35	0
Rock Spring Table	71	0
Gooch Table	132	0
Round Mtn.-Big Spring Butte	201)	75-125
Catnip Mtn.-Bitner Cr.	361)	

D. Plan Implementation

It is anticipated that contracts would be issued during the Fall of 1977 to begin the removal program. Horse gathering would be accomplished from horseback by qualified individuals. Ranchers with experience gathering free-roaming horses live

in the local area and a few who graze livestock on the Range have indicated interest in participating in the gathering. Contractors would be paid a price per head for each horse captured. The methods of gathering would be directed by the contractor but would have to be approved by the Service prior to use. Water trapping may also be used as an attractant/capture technique.

A Service representative would be on hand during actual field activities to insure that the most humane methods of capturing and handling the animals are followed. Contracts would include immediate cancellation clauses in the event of inhumane treatment.

No removal would be allowed between March and May, the primary foaling season. The Government would supply portable gathering facilities and a 5,000-gallon water transporting tank. It would be the contractor's responsibility to put up and take down the corrals; to haul water, if necessary; to properly feed and take care of the horses while they are in his possession; and to provide transportation for the captured horses to a holding area on the Range.

No new roads would be constructed nor would existing roads be upgraded in proposed wilderness areas. Other necessary road construction and/or maintenance would be the contractor's responsibility and would require prior approval from the Service. Additionally, trap placement would be coordinated with Refuge personnel to insure that there would be a minimum disturbance to areas and that the integrity of proposed wilderness areas would not be infringed upon. Permanent holding facilities may be constructed at existing developed sites for use in future years. Use of motorized vehicles would not be allowed, except for transporting the horses from the capture and holding areas.

Service personnel would inspect horses following capture. "Mustang-like" individuals would be returned to the Range to maintain a population similar to those originally introduced to the American West by early Spanish explorers. Deformed, crippled, aged and infirm horses would be disposed of on site by the Service, in a humane manner.

Following capture, the Service would be responsible for transportation of the horses to a sale yard, where they would be sold through public auction. Buyers would be limited to five horses each to minimize the chances of horses ending up at commercial processing plants. Proceeds from the auction sale would be used to offset costs associated with capture, transportation and sale. Any horses not sold at the auction would be disposed of by the Service in a humane manner.

Once the objective level of horse numbers had been reached, a removal program would be initiated to stabilize the age

structure of the two populations. It is anticipated that to avoid range deterioration--and in light of horse reproductive rates--management of herd size would be necessary about every three to four years. Unless legal constraints change, round-up in future years would also be performed from horseback.

E. Purpose and Authority for the Proposal

The Fish and Wildlife Service is responsible for managing the lands and water under its jurisdiction for the primary benefit of all fish and wildlife species. It is the only Federal agency which has as its principal function the administration of fish and wildlife programs. The Service is mandated to protect and enhance all natural resources found within the boundaries of National Wildlife Refuges.

The Service is obliged, therefore, to insure that the wildlife habitat is not abused and, at the same time, it must protect horses from self-destruction by overpopulation.

To stop current range deterioration and improve habitat conditions in the proposed herd management area, the Service proposes to manage the horse population in balance with the primary uses of the area. The Service will also provide for the protection of the horses and enforcement of the law protecting these populations.

The National Wildlife Refuge System Administration Act of 1966, as amended by P.L. 92-223 on February 27, 1976, transferred to the U.S. Fish and Wildlife Service exclusive jurisdiction of the Charles Sheldon Antelope Range. The Service, under the Act, is responsible for the protection and conservation of all fish and wildlife, lands, water and interests therein. Previously, the Range was jointly administered by BLM and U.S. Fish and Wildlife Service under Executive Order 7522, dated December 21, 1936, which established the Charles Sheldon Antelope Range. Section 3 of that Order states that wildlife will be jointly administered by the Secretaries of Interior and Agriculture, now the Bureau of Land Management, and Fish and Wildlife Service. It also states that wildlife will utilize the natural forage first and any forage excess to their needs will be available for domestic livestock. Livestock grazing prior to 1976 was administered by the Bureau of Land Management under the Taylor Grazing Act. The Wild Free-Roaming Horses and Burro Act, P.L. 92-195, does not apply to lands managed within the National Wildlife Refuge System; therefore, the Service is not required to engage in an "adopt-a-horse" program like that conducted by BLM.

P.L. 86-234, dated September 8, 1959, amended Title 13 of the U.S. Code. It prohibits the use of "an aircraft or a motor vehicle

to hunt, for the purpose of capturing or killing, any wild, mule horse, mare, colt, or burro running at large on any of the public land or ranges."

F. Local History

The horses presently found on the Sheldon Range are domestic horses gone wild and the offspring of such horses. They were mustangs on the Range during the early years, but must have come to the northern portions. These animals inter-bred with wild horses over time. In the late 1800s and early 1900s, horses were "managed" like cattle or sheep--although, perhaps, not as intensive. They were rounded up yearly, sorted and worked, sold and turned back out on the range to raise another crop of colts. Quality stallions were turned out with the mares to produce the best colts possible. Many of these early horses were sold to the Army for cavalry horses. Miller and Lux, Harry Wilson and Thomas [unclear] were early settlers in the area who managed herds of horses. It is said that in 1933, there were approximately 300 horses killed on the Range for their hides and that in 1934, only about 40 remained.

From the time the Sheldon Range was established in 1936 until the late 1960s, horses never became a real problem, because periodic roundups were successful in keeping numbers down to manageable and acceptable levels--less than 125 horses. The last roundup took place in the mid-60s and horse numbers were reduced significantly.

By 1971, when P.L. 92-195 was passed, horse numbers had increased to approximately 250. Since then, their numbers have increased to approximately 800 as a result of no controls, because responsibility for management of horse numbers between the Service and BLM was legally unclear. Year-round use of preferred areas has resulted in overuse of the Range, extreme pressure being put on existing water sources and competition with wildlife. Expansion into new areas is occurring, as populations continue to grow unchecked.

G. Interrelationship with Other Agencies and Projects

The Sheldon Range is surrounded by Bureau of Land Management lands. Free-roaming horses are found on their lands. Nearly all of the exterior boundary of the Sheldon Range is fenced, however, so in all practicality, the horses found within the Range are separate and distinct populations.

Approximately 65 percent of the Sheldon Range has been recommended for inclusion in the National Wilderness Preservation System. Until such time as the proposal is approved or disapproved by Congress, it is the Service's responsibility to maintain the proposed wilderness areas in their existing condition.

II. DESCRIPTION OF THE ENVIRONMENT

A. Physical Environment

The 540,000-acre Charles Sheldon Antelope Range is located in Washoe and Humboldt Counties in northwest Nevada. Approximately a section of land also lies in Lake County, Oregon.

The unit is a representative sample of the northern Great Basin-High Desert biome. Topography is characterized by large plateaus, or tables, intermixed with volcanic mountains and ridges. Elevations range between 4,500' and 7,600'. Vegetation is typical of the Great Basin, with sagebrush being the dominant species. It is found in association with a mixture of grasses, forbs, other shrubs, mountain mahogany and juniper. Average annual precipitation ranges between thirteen inches on the west edge and six inches on the eastern edge of the area.

A detailed description of the physical environment of the area can be found in the Sheldon Unit Resource Analysis, on file at the Lakeview, Oregon office.

B. Biological Environment

1. Flora

Major plant species include tall and low sage, greasewood, bitterbrush, bluegrasses, bluebunch wheatgrass, squirrel-tail, needlegrass, Idaho fescue, mountain mahogany and juniper.

2. Wildlife

Big game animals found on Sheldon include antelope, mule deer and California bighorn sheep. Coyotes, bobcats, badger, skunks, raccoon, long-tailed weasel and an occasional mountain lion are found in the area. Nineteen other small mammals are also known to exist and, perhaps, as many as 29 additional species suspected to occur.

Nearly 150 bird species have been recorded on the Range. Sage grouse, an important game bird, are dependent upon the area for year-round requirements.

Fourteen different amphibians and reptiles have been **recorded; however, more investigations are needed to determine species existence and abundance.**

Fisheries habitat is quite limited by water availability. Catnip Reservoir and its tributaries provide an important brood area for Lahontan cutthroat trout. Four other fish species are known to occur, and there are one or more unidentified minnow species found around the Dufurrena/McGee lands.

A detailed description of the biological environment of the area can be found in the Sheldon Unit Resource Analysis, on file at the Lakeview, Oregon office.

3. Domestic Stock

A long and colorful history is associated with livestock use on the Sheldon Range. Intensive livestock grazing started in the late 1850s. Prior to 1926, Miller and Lux controlled a majority of the deeded lands within what is now the Range. They operated a cattle and horse operation on these lands and the surrounding open range. Thomas Dufurrena obtained control of Miller and Lux holdings in 1926 and leased most of his holdings to Ben Yruegui, a sheepman. S.O. Cressler grazed cattle in the northwest portion of the Range and on Bald Mountain.

Surprise Valley cowmen began pushing cattle into the southern portion of the Range during the early 1930s, and a range war--more or less--raged between them and Yruegui during this time.

In 1937 and 1939, the Fish and Wildlife Service acquired the Dufurrena and Cressler properties, respectively. The Charles Sheldon Antelope Range was established in 1936 by withdrawal of Public Domain Lands. Under the dual BLM-FWS administration, the Bureau of Land Management administered the grazing program; but with the passage of P.L. 94-223 in 1976, the Fish and Wildlife Service assumed this responsibility.

Currently, there are nine permittees grazing approximately 3,600 cattle on the Range each year. These cattle use about 24,000 AUMs annually.

As mentioned earlier the Service has begun preparation of a resource management plan for the Range. The permittees have been made aware that past management practices are being re-evaluated and are expecting adjustments to current grazing programs. Some of these adjustments will begin in 1978.

Voluntary reductions, and in one case complete non-use, were taken during 1977 by four of the permittees because of drought conditions. The permittees have all expressed an interest in working with the Service to improve current range conditions.

III. ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

The proposed action requires gathering nearly 700 horses. In so doing, the following impacts would result:

- A. The condition of desirable forage plants would improve and, ultimately, the health and vigor of all herbivores would reflect the condition of the forage plants.

- B. Soil erosion rates would be reduced with increased plant vigor. This, in turn, would improve water quality, as there would be less siltation entering water sources. Ground water resources would likely increase if sheet surface runoff is reduced and percolation potential enhanced.
- C. There would be a beneficial impact on wildlife, particularly in those areas where the range is now in a static or declining trend. Pressure on localized areas, such as watering sources and meadows, would be relieved. These areas are important sage grouse areas. Key deer and antelope browse species, while continuing to be used, would not be so widely overused.
- D. During the actual gathering activities, localized impacts on vegetation and soil would result. Disturbance to wildlife would be minimal.
- E. Injury to the horses during gathering activities may occur, due to the rugged terrain. Colts and mares may become separated. Those horses remaining would probably maintain a healthier population, due to increased and improved forage production and reduction of intraspecific strife.
- F. There is a potential risk of personal injury to the gatherers during roundup activities.
- G. Reduction of horse numbers would reduce viewing opportunities to some extent. Remnant herds would be located in areas usually accessible to the viewing public.
- H. Disposal of excess horses would result in a negative emotional impact on some individuals.

IV. MITIGATING MEASURES INCLUDED IN THE PROPOSED ACTION

Methods proposed for use in rounding up and removing horses from the Range incorporate a variety of features designed to reduce adverse impacts. Removal of horses would not be allowed during the main foaling season, March through May. The Service would make water available to further insure that undue stress on horses does not occur. To avoid jeopardizing wild land qualities, development of roads into proposed wilderness areas would not be allowed. Additionally, corrals would be removed from those areas after use to preserve their existing character. Gathering, holding and removal of horses would be overseen by Service personnel to insure that the animals were treated humanely and the activities were conducted in a manner consistent with objectives for management of the Range. Coordination of the proposal with concerned parties has been undertaken to allow for consideration of divergent interests.

V. UNAVOIDABLE ADVERSE IMPACTS

Removal of about 700 horses would reduce the opportunity for people to view free-roaming horses at Sheldon.

There would be an adverse emotional impact on some people, due to the disposal of excess horses.

VI. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE OF LAND'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Initial removal of several hundred free-roaming horses, and maintenance of herd size at 75-125 head would reduce public viewing opportunities, while enhancing long-term natural forage and wildlife resources of the Range. In the long-run, the public opportunities to view wildlife would improve. It is the Fish and Wildlife Service's responsibility, as trustees of the environment, to manage all natural resources, including horses. However, horse numbers must be balanced with wildlife resources. Implementation of the horse management plan would ensure that the primary objective for establishment of the Sheldon Range is met.

VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Except for the loss of excess horses, there would be no major irreversible or irretrievable commitments of natural resources included in the proposal.

VIII. ALTERNATIVES TO THE PROPOSED ACTION

Alternative A

Take no action--allow natural increase in the horse population to continue unchecked until they fill every environmental niche they are capable of filling. Maintain current livestock use.

Under this alternative, the environment in which the wild horses are presently found would be adversely impacted to the extreme. Populations would increase beyond the carrying capacity of the land to support them and, eventually there would be a massive die-off.

Overgrazing of desirable perennial forage plants would reduce vigor and reproduction until they disappeared from the vegetative composition. Other desirable forage plants, including browse species, would decrease as a result of overuse. Range forage diversity would decrease and plant communities tend toward a monotypic type, unattractive to many wildlife species. The most aggressive animals (horses) would probably utilize most of the forage to the detriment of the least aggressive (deer, antelope, and bighorn sheep).

This increased competition for forage, and also for water, would adversely affect production and survival of deer, antelope and bighorn sheep young and, therefore, the total populations of these species would decrease as vegetative cover was removed. Soil erosion would become widespread. Water sources--particularly, springs and adjacent stringer meadows--would be severely abused. The meadows are critical sage grouse habitat, as they provide insects and forbs for young birds in June and are utilized throughout the summer and fall. Over-utilization of these areas by horses would decrease sage grouse populations.

If allowed to expand, as at present, horse numbers would increase to the point where they became the single most dominant use, to the detriment of all other natural uses presently being made.

Adjacent communities are dependent on the livestock industry for economic livelihood. Impacts of uncontrolled horse populations would lead to financial losses for the permittees--which, in turn, would be felt by the community. Recreation potential, including wildlife observation and hunting, would be adversely affected. Horse viewing opportunities would increase.

Alternative B

Reduce livestock and wild horse numbers.

Reducing both cattle use and horse numbers would have a high, beneficial impact on all the other various components making up the environment. The natural landscape would be enhanced if the vegetative cover, water quality and quantity, and the animals were in balance with each other.

The short-term economic impact upon the local livestock industry of reducing cattle grazing would be adverse; however, after livestock operations have adjusted to the reductions, improved range conditions and subsequent increase in pounds of beef produced per animal should offset the fewer numbers allowed to graze.

Implementation of the resource management plan is scheduled for the near future. An ecological site and condition inventory was conducted during the summer of 1977 as an initial step in the planning process. Preliminary analysis of the data suggest that changes in grazing practices are necessary, and permittees have been made aware as to the approximate time they would likely occur.

Due to the high reproductive rate of horses (approximately 25% per year), populations doubled between 1973 and 1976 and are projected to double again by 1980. For this reason, therefore, controls are necessary immediately--independent of any livestock grazing management plan.

Alternative C

Maintain wild horse populations at present level. Reduce livestock use by allowing fewer livestock and/or shorten the grazing season. The economic impact on the local livestock industry of reducing grazing would be adverse initially; however, many operators could probably absorb the impact of reduced allotments. Eventually, they might benefit through production of more pounds of beef per cow, due to improved conditions.

The methods and degree of reduction in livestock use would determine the degree of impact on wildlife. Overall reduction of livestock numbers would decrease competition for food, water and space, which would benefit wildlife to some degree. Changing seasons of use might also be beneficial, in some instances.

However, maintaining present horse populations would continue to have an adverse effect on the range condition--particularly, in the two high-use areas. The present population of nearly 800 animals does not allow meeting wildlife objectives, even if livestock numbers were reduced.

Alternative D

Reduce wildlife numbers.

Such an action, although initially increasing the availability of forage for use by horses and cattle, would have only very short-term benefits--if any--in reducing overuse of the Range. Soil erosion and water quality would be enhanced very little, as current wildlife populations are not excess and therefore are not causing resource damage. Adverse impacts on wildlife species in some way dependent on the species reduced would be noted. The overall ecologic system would be disrupted.

Public use (including hunting, photography, nature study and observation) of the Range and its wildlife resources would diminish significantly.

The attitude of many people on both the local and national level toward this alternative would be extremely antagonistic. Set aside specifically for wildlife, such an action would not be consistent with the Executive Order establishing the Range.

Alternative E

Eliminate all free-roaming horses and burros. This alternative was proposed by several commentators when the EIA was circulated for review. It would involve total removal of all horses and burros now on the Range with disposal through sale or by other means. Wildlife and habitat management would be focused upon the remaining large mammals (pronghorn antelope, mule deer and bighorn sheep) and sage grouse that are considered indigenous to the area. Management of livestock grazing would continue as with the proposed action.

Implementation of this alternative would result in most of the favorable natural resource-oriented effects of the proposed action. Range condition and forage vigor would improve, vegetative diversity would probably increase and soil erosion decrease. Herbivores and other animal species in the area would benefit from decreased forage competition and improved habitat conditions.

Although elimination of the horses and burros would directly benefit many native wildlife species, animals considered indigenous to the area are only so in a relative evolutionary sense. Horses and burros were introduced by man to the North American continent centuries ago and are considered by many to be an inseparable part of the Western scene; removal would constitute a loss to people possessing those sentiments.

As regards the burro, elimination of this animal from the area would benefit the Range only slightly because its numbers do not at present pose a major threat to the habitat.

The proposed removal of excess horse numbers is an emergency action designed to meet an immediate need. The questions of long-term horse and burro management on Sheldon will be addressed in the resource management planning process.

IX. CONSULTATION AND COORDINATION WITH OTHERS

Implementation of the horse management plan has been discussed with representatives of the Nevada Fish and Game Department, Department of Agriculture, Governor's Office, University of Nevada, and local offices of the BLM. Additionally, representatives of the organizations listed in Table 2 have, within the last year, received guided field tours of the Range and been shown the effects upon the condition of forage of excess horse numbers.

TABLE 2

ORGANIZATIONS RECEIVING FIELD TOURS OF SHELDON

<u>Name</u>	<u>Date of Tour</u>
Oregon Environmental Council	September, 1976
Friends of the Earth	September, 1976
The Wilderness Society	September, 1976
Defenders of Wildlife	September, 1976
Sierra Club	September, 1976
Nevada State Chapter, National Wildlife Federation	June, 1977

During September of this year a meeting was held in Reno, Nevada to discuss the proposed horse management plan with interested parties. In addition to one individual representing himself, and employees of the U.S. Fish and Wildlife Service, representatives of the following agencies and organizations were in attendance: Nevada Department of Fish and Game, Sierra Club, Wild Horse Organized Assistance, Nevada Wildlife Federation and University of Nevada. Participants agreed that the horse management plan, as originally proposed, should be modified somewhat to accomodate concerns raised regarding humane treatment of captured animals. Therefore, the revised plan incorporates provisions for sale, by public auction, of horses following round-up. It was felt that this procedure, by providing opportunity for purchase by private individuals would reduce the potential that horses would be sold to commercial processing plants. Additional comments received from BLM (an agency that has developed expertise in horse management programs in recent years) suggested that limits be placed on buyers to further guard against wholesale purchase of large numbers of animals for commercial purposes. The revised plan, therefore, includes a limit of five horses per buyer.

Another comment dealt with road construction in proposed wilderness areas. The current wilderness proposal for Sheldon was modified to incorporate much of the land proposed by citizen-conservationists following input at the public hearing, and roads would not be constructed or up-graded in these areas. Lands outside the proposed wilderness areas would be treated like other refuge lands and be subject to the same constraints on new construction. It is not anticipated that new roads would be constructed or existing roads substantially modified for the purpose of gathering or transporting horses.

Numerous other letters were received by the Service commenting on the proposed horse management plan. Significant comments were incorporated in the revised EIA and the plan appropriately modified. Copies of all letters received are attached (See Appendix B).

Copies of this revised Environmental Impact Assessment have been provided to those agencies, organizations and individuals listed in Appendix A, Mailing List. Asterisked names denote those reviewers providing written comments on the EIA.

November, 1977

APPENDIX A
MAILING LIST

Anthony Amaral General Delivery Carson City, NV 89701	Fremont National Forest P.O. Box 551 Lakeview, OR 97630 ATTN: John Chambers
Jack Arntz c/o University of Nevada Dept. of Renewable Natural Resources Reno, NV 89507	*Friends of the Earth 4512 University Way, N.E. Seattle, WA 98105 ATTN: Dale Jones Northwest Representative
Andy Burnett 426 Rock Blvd. Sparks, NV 89431	*Nevada Dept. of Fish and Game P.O. Box 10678 Reno, NV 89510
California State Office Bureau of Land Management Federal Bldg., 2800 Cottage Wy. Sacramento, CA 95825 ATTN: John Birch	Nevada Wildlife Federation 5334 Valley Vista Way Sparks, NV 89431 ATTN: Wayne Capurro
*Bureau of Land Management Lakeview District Office P.O. Box 151 Lakeview, OR 97630	Nevada Wildlife Federation P.O. Box 49 Sparks, NV 89431 ATTN: Camille Monday
*Bureau of Land Management Susanville District Office P.O. Box 1090 Susanville, CA 96130	Michael Pontrelli 1137 Buena Vista Reno, NV 89503
Bureau of Land Management Winnemucca District Office 705 E. 4th St. Winnemucca, NV 89445	*Bernard Shanks, Associate Professor c/o Dept. of Forestry and Outdoor Recreation
*Thadis Box, Dean c/o College of Natural Resources Utah State University Logan, UT 84322	College of Natural Resources UMC 52 Utah State University Logan, UT 84322
Char Corkran 130 N. 114th Portland, Oregon 97229	Oregon Dept. of Fish & Wildlife P.O. Box 3503 Portland, Oregon 97208
Defenders of Wildlife 16245 N.E. 28th St. Bellevue, WA 98008 ATTN: Sandy Davis	*Oregon Environmental Council 2637 S.W. Water Ave. Portland, Oregon 97201 ATTN: Larry Williams

Sierra Club
3340 Berthood Ln.
Reno, NV 89503
ATTN: Tina Nappe and Jane Bourino

Sierra Club
4534½ University Way, N.E.
Seattle, WA 98105
ATTN: Linda Haverfield

Society for Range Management
Pacific Northwest Section
600 Waverly Ct., No. 203
Box 3861
Portland, Oregon 97208
ATTN: Rex Morgan

Society for Range Management
Nevada State Section
P.O. Box 41
Minden, NV 89423
ATTN: Ken Genz

The Wilderness Society
Northwest Representative
P.O. Box 533
Eugene, Oregon 97401
ATTN: Joe Walicki

Wild Horse Organized Assistance
P.O. Box 555
Reno, NV 89504
ATTN: Dawn Lappin

APPENDIX B
LETTERS OF COMMENT RECEIVED
ON THE SHELDON HORSE
MANAGEMENT PLAN - EIA



IN REPLY REFER

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

P. O. Box 151
Lakeview, Oregon ;97630

September 14, 1977

Regional Director,
U. S. Fish and Wildlife Service
1500 N. E. Irving St.
P. O. Box 3737
Portland, Oregon

Dear Sir:

We have reviewed Environmental Impact Assessment for the horse round-up in the Sheldon Refuge and do not have any comments to make.

Sincerely yours,

Richard A. Gerity
District Manager





RECEIVED
FISH
SEP 21 1977

MIKE O'CALLAGHAN
GOVERNOR

GLEN K. GRIFFITH
DIRECTOR

1100 VALLEY ROAD

P.O. BOX 10678

RENO, NEVADA 89510

TELEPHONE (702) 784-6214

September 21, 1977

Mr. Kahler Martinson
Regional Director
U.S. Fish and Wildlife Service
P. O. Box 3737
Portland, OR 97208

Dear Kahler:

We have reviewed your Environmental Impact Assessment for implementation of the Sheldon Horse Management Plan.

We find this Plan to be well written and that it adequately covers the needs that are present on the Sheldon Refuge and Range. We certainly Hope that it will be possible for you to implement this program at the earliest possible time.

Sincerely,


Glen K. Griffith
Director

/paj

OREGON ENVIRONMENTAL COUNCIL

2637 S.W. Water Ave., Portland, Oregon 97201

R. Wahler Martinson, F.W. Regional Director
U. S. Fish and Wildlife Service
P. O. Box 3737
Portland, Oregon 97208

September 30, 1977

Dear Mr. Martinson,

The Oregon Environmental Council would like to offer some comments on the Environmental Impact Assessment for the Sheldon Horse Management Plan, and we thank you for sending us a copy to review. In our opinion the EIA is a well written document that quite adequately discusses the proposed action, the impacts, and the alternatives. We are well aware of the horse overpopulation problem on the Sheldon Range and agree with the proposed plan to reduce horse numbers to two small herds. Some specific suggestions for improvements in the EIA and the plan follow, organized by page number in the EIA.

Page 1 - The Management Plan should include feral burros as well as horses, unless there is a separate plan. If they are separate, this EIA should at least have mentioned the burros and how their management relates to that of horses.

Page 2, top - The discussion of increasing horse numbers should have included the fact that there are no naturally occurring predators that exert any noticeable control on the horse population.

Page 3, paragraph 3 - The Service should have the right to take individual captured horses from the gatherers and return them to the range for purposes of maintaining healthy herds and encouraging a "mustang type" (see further discussion below).

Page 3, para. 7 - If proposed wilderness areas contain any old roads, they should not be improved or maintained for horse gathering. The Service should take a more active role, than that described, in planning whether or not road construction is necessary, and if so where and how.

Page 4, para. 2 - Proposed stabilization of the age structure of the two horse populations needs to be explained. What would the age structure be? Also, we would like to see some really positive horse management here. If horses are to be part of these ecosystems, apparently just for the purpose of the viewing pleasure of the public, then they should, in our opinion, look like mustangs, rather than like a motley group of misfits and culls that the gatherers could not catch or could not stand to take home. Chris Vosler, B.L.M. Burns District Manager, is doing an admirable job of sorting horses as they are sent, letting the public "adopters" take the obviously half-bred.

and part-standard breeds, destroying the sick and deformed, and carefully selecting a few of the small, heavy-chested "mustang types" to return to the range where they were captured. We suggest that the individuals from the Service who will be responsible for the roundup of horses on Sheldon spend some time with Mr. Wooller first (if they have not already). Will future reductions in horse numbers, as anticipated every 3 or 4 years, be carried out in the same way? This should have been explained.

Page 5, E. - The distinction between feral horses and mustangs is definitively made but needed to be explained in the BIA. Also, if all the mustangs were not wiped out, then probably they must have bred with the feral horses, so that the current population includes blood from mustangs as well as more recently domestic horses. This should have been clarified in this discussion. Why have there been no roundups since the mid-1950s?

Page 7, 3. - What was the approximate total of AUMs of livestock grazing in peak years in the past, as compared to the figure of 24,000 AUMs at present? It is somewhat unclear which men were grazing livestock at Sheldon during the same years.

Page 7-8, III. - Well analyzed.

Page 9-11, VIII. - Some logical and interesting alternatives are informatively discussed here. Alternative B is well stated and we are confident that badly needed improvements in the livestock grazing program will come quickly, under a separate plan. Alternative D should perhaps have included the fact that wildlife numbers are not currently high enough to be a certain resource damage, but that some wildlife populations could be controlled by heavy hunting pressure if it was found necessary for the long-term health of the ecosystem. We think perhaps there should have been an Alternative E - Remove all wild horses and burros, for the sake of discussion, since this is apparently an option open to the Service because of the wording of the Wild Horse and Burro Act. Assuming that livestock grazing pressure will also be lightened by better grazing systems, we support the proposed plan of action rather than any of the alternatives..

We must just add that the September, 1975 field tour of Sheldon (and Hart Mtn.) still stands as far and away the most informative and enjoyable such trip we have been taken on by any agency. In particular we found Pete Carter and Eldon McLaury to be exceptional individuals who gained our highest respect and confidence in their judgement and their commitment to the best management of the resources under their responsibility. We wish Pete well and hope his replacement at Sheldon is as good.

Thank you for the opportunity to express our views on the Sheldon Horse Management Plan and the Environmental Impact Assessment. We hope this letter will be received in a timely and be considered.

Very sincerely,



FRIENDS OF THE EARTH

October 17, 1977

Mr. R. Kahler Martinson
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 3737
Portland, Oregon 97208

Dear Kahler:

We have reviewed the Environmental Impact Assessment (EIA) for implementation of the Sheldon Horse Management Plan which you sent us on September 8, 1977. The plan calls for removal of approximately 700 free - roaming horses from the Sheldon Refuge and Range.

Friends of the Earth support this proposal. However, last year's onsite tour of Refuge and Range confirmed our suspicions that the major problem at Sheldon is not caused by the wild horses but rather by the overgrazing of cattle, particularly on the range portion of the complex. Therefore, we urge the Fish and Wildlife Service to act with speed and vigor to implement a program to reduce cattle grazing on the area.

We hope that the Fish and Wildlife Service has, or is in the process of preparing, a plan to further this goal and we hope that you will keep us informed of your plans and progress.

Sincerely,

Dale R. Jones
Northwest Representative

DRJ/sg

cc: Marvin Kaschke, Larry Williams, Anne Wickham

RESOLUTION

Board of Directors, Society for Range Management

WHEREAS, scientific studies have clearly shown that feral horses in the Bill Williams-Big Sandy area of western Arizona are destroying vegetation and severely damaging bighorn sheep habitat in that area, and range resources;

WHEREAS, it is clear that the burro population in that area must be drastically reduced in the near future to keep further serious damage from being done; and

WHEREAS, the Bureau of Land Management has indicated no immediate program to adequately reduce burro numbers;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors, Society for Range Management, that everything possible be done to encourage the Bureau of Land Management to use existing authority to reduce burro numbers now on the Bill Williams-Big Sandy area and that appropriate management agencies apply the same control methods on any area where feral animals are damaging wildlife range and/or resource conditions.

BE IT FURTHER RESOLVED that Federal legislation be drawn and passed providing for more practical methods of managing wild horses and burros.

SRM

SOCIETY FOR RANGE MANAGEMENT

THADIS W. BOX
COLLEGE OF NATURAL RESOURCES
UTAH STATE UNIVERSITY
LOGAN, UTAH 84302

Office: (801) 752-4100 ext. 2613
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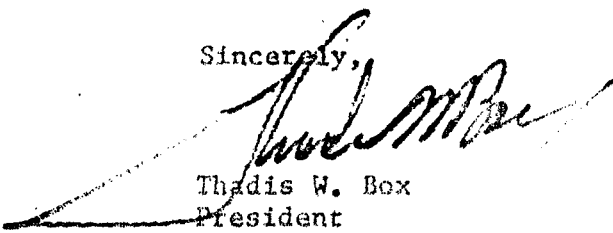
October 10, 1977

Mr. Kahler Martinson
Regional Director
Pacific Region
U.S. Fish and Wildlife Service
P.O. Box 3737
Portland, Oregon 97208

Dear Mr. Martinson:

I have reviewed the Sheldon Horse Management Plan. You are to be congratulated on the prompt response to reduce numbers so that range deterioration will not occur. Our Board has spoken directly to horse and burro problems in Arizona and expanded the concept to include the the general problem of overpopulation. I am attaching our statement released at Portland. I hope it will be useful to you.

Sincerely,

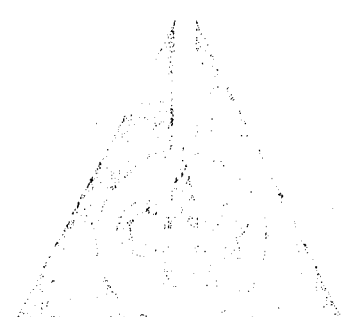

Thadis W. Box
President

THB:alg

COLLEGE OF NATURAL RESOURCES

Portland State University

September 1977



OFFICE OF THE OREGON
STATE ENGINEER

October 10, 1977

Mr. Kahler Martinson
National Director
Pacific Region
U.S. Fish and Wildlife Service
P.O. Box 3737
Portland, Oregon 97208

Dear Mr. Martinson:

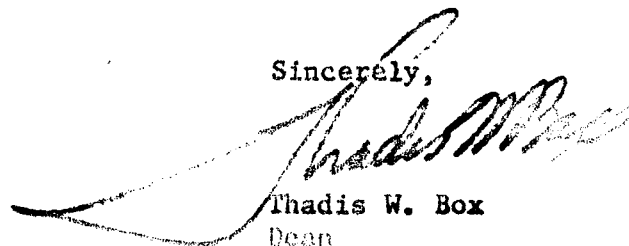
I have reviewed your EIA for the Sheldon Horse Management Plan. I will comment on it as a practicing ecologist and as a member of the National Wild Horse and Burro Advisory Board.

First, I believe you have made a good case for the necessity of reducing the horse numbers. There is little doubt that if you allow the herds to increase, you will damage the habitat for native species.

If you follow your plan of leaving residual herds in the area, I suggest you leave the traps, corrals, access roads, etc., necessary for horse removal and management. It will only be a matter of time until you have to cull the herd again, and well hidden permanent facilities will do less environmental damage than building them and tearing them out each five years.

In my opinion, you should eradicate the horse population entirely. The Fish and Wildlife Service lands are not covered by the National Wild Horse and Burro Act. It is not the purpose of your service to propagate exotic species. I would suggest that the Sheldon area get out of the feral horse business and leave that to BLM.

Sincerely,



Thadis W. Box
Dean

TWB:alg

Memorandum

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Susanville, California

BUREAU OF LAND MANAGEMENT

To : Regional Director, Fish & Wildlife Service

Date: OCT 4 1977

From : District Manager, Susanville

Subject: Sheldon Wild Horse Management Plan EIA

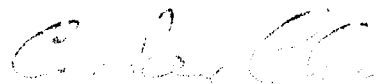
After reviewing the Sheldon Horse Management Plan EIA, there was one major cause of concern. In the EIA it was stated that grazing permittees would be allowed to capture the wild horses and would receive title to these horses as compensation for gathering costs. This could indicate that most of the wild horses captured would go to slaughter. Public reaction to this type of program could cause considerable resistance to future Sheldon Refuge Management and wild horse management in general, and lead to more restrictions on how you conduct your population control program.

Although the Sheldon Refuge does not fall under Public Law 92-193, The Wild Horse and Burro Management Act, your program will generate tremendous public interest. Our management guidelines are different but to the general public we are one and the same. Handled properly, this program could benefit overall wild horse management. As an alternative to the above mentioned capture method, I would like to propose the following:

1. That the Sheldon contract the horse gathering with either experienced private crews or experienced crews from other government agencies.
2. Wild horses captured be put up for public auction to offset gathering costs. Further, that a limit of one horse per buyer be set to discourage purchase for slaughter.

In this manner, most of the horses would go to homes much as those in the Adopt-A-Horse Program. This is an opportunity to demonstrate to all concerned that wild horses can be managed judiciously without overly restrictive laws. It could also be a positive example for changing the wild horse law to allow a change of title to adoptees, and might eventually lead to consideration of other changes.

If you wish to discuss these matters further, please feel free to call.



cc State Director Calif w/copy of EIA